

KEMP & KEMP
ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110
LAS VEGAS, NEVADA 89130
Tel. (702) 258-1183 • Fax (702) 258-6983

JAMES P. KEMP, ESQ.
Nevada Bar No.: 6375
VICTORIA L. NEAL, ESQ.
Nevada Bar No.: 13382
KEMP & KEMP
7435 W. Azure Drive, Suite 110
Las Vegas, NV 89130
702-258-1183 ph /702-258-6983 fax
jp@kemp-attorneys.com
vneal@kemp-attorneys.com

Attorneys for Plaintiff
Jorge Rosales

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JORGE ROSALES,

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada Corporation;
ROE Business Organizations I-X; and DOE
INDIVIDUALS I-X, inclusive,

Defendants.

Case No. 2:17-cv-03117-JCM-VCF

**STIPULATION AND REQUEST FOR
EXTENSION OF PLAINTIFF'S
DEADLINE TO RESPOND TO
DEFENDANT'S RENEWED MOTION
FOR SUMMARY JUDGMENT AT ECF
NO. 45**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record, subject to the Court's approval, that there will be an extension of time up to and including September 25, 2020, a period of three-weeks, to respond to Defendant's Renewed Motion For Summary Judgement at ECF No. 45. This is the first request of an extension of this deadline. This Request for an extension of time is not sought for any improper purpose or other delay.

The parties provide the following additional information to the Court regarding the requested extension of time. This case was reversed and remanded by the Ninth Circuit on July 27, 2020. **ECF No. 39**. Thereafter, the Court ordered the parties renew their motions for summary judgement and "that briefing shall proceed in the ordinary course." **ECF No. 42**. On August 14,

2020, Defendant filed its renewed motion for summary judgement. **ECF No. 45**. The current deadline for Plaintiff's Opposition is September 4, 2020.

Plaintiff's counsel, Ms. Neal, has a Nevada Supreme Court response brief, four motions to dismiss, attendance at an Early Neutral Evaluation conference, an unemployment hearing, as well as discovery responses, client meetings, and other normal course of business considerations taking place before or shortly after the date the Opposition in this matter is due. Counsel has experienced an increase in workload due in part to Plaintiff's counsel, Mr. Kemp, being out the end of July and the majority of August as he recovered from Covid-19, and now as he continues to recover from the residual effects.

WHEREFORE, the parties respectfully request that this Court extend Plaintiff's deadline to respond to Defendants' Renewed Motion for Summary Judgment from the current deadline of September 4, 2020, to September 25, 2020, a period of three-weeks.

DATED this 28th day of August 2020.

/s/ Victoria L. Neal

James P. Kemp, Bar No. 6375.
Victoria L. Neal, Bar No. 13382
7435 W. Azure Drive, Suite 110
Las Vegas, Nevada 89131

Attorneys for Plaintiff Jorge Rosales

/s/ Deverie J. Christensen

Deverie J. Christensen, Bar No. 6596
Phillip Thompson, Bar No. 12114
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

Attorneys for Defendant Bellagio, LLC

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

September 1, 2020
Dated: _____

KEMP & KEMP
ATTORNEYS AT LAW
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